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Environmental Affairs Division

MORRIS ENVIRONMENTAL SERVICES

31629 37th Avenue SW
Federal Way, WA 98023

(206) 874-2207

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February 5, 1989

Mr. Kamol Lekhakul
G. L. Construction
8040 SE 36th Street
Mercer Island, WA 98040

Dear Mr. Lekhakul:

The following are procedures recommended for the removal of PCB-contaminated fluids and tanks and preparation for shipment.

Preparation

Prior to any of these operations, a Generator Waste Product Questionnaire (profile sheet) will be prepared and submitted to the disposal facility (Envirosafe Services of Idaho, Inc.).

Tank Emptying

All access hole covers at the top of the tanks will be removed. A sheet of plastic will be placed around each hole to catch any dripping fluid.

A suction pump will be placed over each tank hole and a hose or pipe extended to the fluid surface. The discharge hose or pipe will extend to drums specified below.

As much free fluid as possible will be removed from each tank. When it is apparent that no further material can be pumped, the pump will be carefully removed from the tank, taking precautions to prevent spills of any residual fluid. Rubber gloves will be worn for handling of contaminated portions of the pump. *by GL*
nitrite (solvent)

The pump will be carefully handled to prevent spills or contamination as it is moved between different tank ports.

When each tank has been emptied of free and/or pumpable fluid, any parts or plastic sheet will be removed from the tank. Any spill that contacted the tank or soil will be removed.

*Nothing on deck of
equip! Pump, digging equip, etc.
Nothing on sampling.*

SCL 04102

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Floor Dri (TM) or an equivalent absorbent will be poured into the tank openings to capture any residual free fluids. The tank covers should then be replaced.

Drum Filling

Drums specified for the transportation of PCB-contaminated materials will be prepared by filling them about 30% full with Floor Dri (TM) or an equivalent absorbent material. The drums will be placed on a plastic sheet near the tanks to be emptied.

Need a berm to contain spills.
Fluid will be pumped to a drum until the fluid reaches the top of the absorbent material. The mixture will be stirred; more absorbent and fluid will be added and stirred until the drum is full.

Stirred w/ what? Decon? Dispose of?

After the pump is shut off, the discharge hose will be allowed to drain and then carefully moved to the next drum to be filled; rubber gloves will be used for handling the hose or any contaminated item. Any spill will be immediately wiped up.

If required, additional absorbent will be added to the filled drum prior to replacement of the lid.

Any spilled fluid will be removed from the outside of the drums.

what will they say? Need chain-of-custody tracking.
Labels will then be applied to the drums. *need manifests*

Tank Removal

Inerting - Marine Chemist etc. No...
Tank removal will be performed by others. The tank should be lifted in such a manner that it is not mishandled or damaged in a manner that will endanger the structural integrity of the tank. *Need a diaper - Need inspection for leaks, holes - Need sampling*

When either tank is removed, the soil should be inspected to determine if a leak from the tank, or from spillage, had previously occurred.

required by Spec

The tank will then be labeled.

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Solid Waste

Any PCB-contaminated rags, clothing, used hose, etc., will be placed in a proper drum and included in the shipment of tanks and solidified oil.

Lifting/Loading

The tanks will be placed on plastic sheeting, ^{where?} which can be drawn up to create a "diaper" to contain any leak that might occur during transportation. The truck to be utilized will have sideboards. ^{how secured? Straps, chocks, etc. Plug holes?}

The drums will be loaded carefully to ensure they maintain their integrity.

All tanks and drums will be secured prior to departure from the scene. A Uniform Hazardous Waste Manifest will be prepared and signed by the generator(SCL). Proper placards will be placed on the vehicle(s) — ^{Do you know what's required?}

Safety and Health Precautions

Certain PCB mixtures have been identified as suspected human carcinogens. At the low concentrations present in the waste oils at City Light, the risk to workers is very slight. ^{Heavy rubber gloves (sol rex) gloves} Nonetheless, exposure should be minimized. ^{Heavy rubber gloves (sol rex) gloves} Heavy rubber gloves should be utilized when handling contaminated items (such as hoses); the gloves should not be used for any other purpose, including handling of noncontaminated items.

Protective clothing such as Tyvek (TM) suits will protect other clothing from contamination, but are optional to wear. Any clothing that does come in contact with PCB-contaminated oil will be disposed as noted above. ^{shoe covers not optional.}

Goggles are recommended if there is a likelihood of splashing oil during drum filling.

As should be done with any chemical handling, hands must be washed prior to eating or smoking when handling PCBs or solvents. Hands should also be washed prior to using rest room facilities. ^{Oily soil known to be present.}

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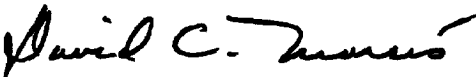
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General

No written procedure can anticipate every problems. Workers performing this job should be instructed to use common sense and to ask questions if there are any concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "David C. Morris". The signature is fluid and cursive, with a long horizontal stroke at the end.

David C. Morris
Certified Hazardous Materials Manager

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